

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES  
Administration for Children and Families  
Administration on Children, Youth and Families  
Children's Bureau

**Final Report**  
**Washington Child and Family Services Review**

**February 11, 2004**

**U.S. Department of Health and Human Services**  
**Administration for Children and Families**  
**Administration on Children, Youth and Families**  
**Children's Bureau**

## **EXECUTIVE SUMMARY**

### **Final Report: Washington Child and Family Services Review**

This document presents the findings of the Child and Family Services Review (CFSR) for the State of Washington. The CFSR was conducted the week of November 3, 2003 (in Federal fiscal year [FY] 2004). The findings were derived from the following documents and data collection procedures:

- The Statewide Assessment, prepared by the State child welfare agency – the Washington Department of Social and Health Services, Children’s Administration (CA);
- The State Data Profile, prepared by the Children’s Bureau of the U.S. Department of Health and Human Services, which provides State child welfare data for the years 2000 through 2002;
- Reviews of 50 cases at three sites in the State (Clark County, Grant and Adams Counties, and King County); and
- Interviews or focus groups (conducted at all three sites and at the State-level) with stakeholders including, but not limited to children, parents, foster parents, all levels of child welfare agency personnel, Tribal representatives, collaborating agency personnel, service providers, court personnel, and attorneys.

The CFSR assesses State performance with regard to seven systemic factors and seven child outcomes. With regard to the outcomes, a key strength identified pertained to the indicator of maltreatment in foster care. For this indicator, the State’s percentage of children maltreated while in foster care in FY 2002 is less than the national standard for that measure. Another area of strength pertained to two indicators used to assess Permanency Outcome 2 (The continuity of family relationships and connections is preserved for children in foster care); the State was found to be effective in placing children in foster care in close proximity to their biological families (item 11) and with their siblings, when appropriate (item 12).

CFSR findings, however, indicate that the State did not achieve substantial conformity with the seven outcomes assessed through the CFSR. With regard to Safety Outcome 1 (Children are first and foremost protected from abuse and neglect), the CFSR found in the cases reviewed that the CA responded to the majority of maltreatment reports in accordance with State-established timeframes. However, a key concern identified is that there were delays in some cases in responding to reports of maltreatment, including delays in response to reports that were considered to be high risk as well as those classified as low risk.

The State also did not achieve substantial conformity with Safety Outcome 2 (Children are safely maintained in their homes when possible and appropriate). Although CFSR findings indicate that the State has developed comprehensive risk assessment tools, case reviewers determined that in some cases, safety assessments and/or service provision were not sufficiently comprehensive to ensure

children's safety, and/or social workers were not monitoring safety plans and service participation when children remain in their homes.

The State did not achieve substantial conformity with Permanency Outcome 1 (Children have permanency and stability in their living situations). This outcome was determined to be substantially achieved in 44 percent of the foster care cases reviewed and each indicator for the outcome was rated as an Area Needing Improvement. CFSR case review findings indicate that the CA is not consistent in preventing foster care re-entries, ensuring placement stability for children in foster care, establishing appropriate permanency goals in a timely manner, achieving permanency for children (through adoption, reunification, guardianship, or permanent placement with relatives) in a timely manner, or ensuring that older children in long-term foster care receive appropriate services to assist them in making the transition from foster care to independent living.

Both case reviewers and stakeholders identified the following court-related issues as potential barriers to achieving permanency for children in a timely manner: overburdened court dockets, a frequent practice of granting continuances for court hearings, and insufficient legal representation for parents and for the agency. However, stakeholders interviewed during the onsite review expressed the opinion that recent State efforts to improve legal representation and to increase in the number of judges who are more knowledgeable about child welfare issues have the potential to have a positive impact on permanency for children.

Well-being Outcome 1 (Families have enhanced capacity to provide for their children's needs) was an area of particular concern because it was determined to be substantially achieved in 24.0 percent of the cases reviewed. Case review findings for this outcome indicate that the CA is not consistent in its efforts to (1) meet the services needs of children, parents, and foster parents (item 17); (2) involve children and parents in the case planning process (item 18); and (3) ensure that agency social workers have sufficient contact with the children (item 19) and parents (item 20) in their caseloads, particularly the children and parents in the in-home services cases. Stakeholders interviewed during the onsite CFSR reported that the CA is in the process of addressing concerns about insufficient social worker contact and has proposed changes to agency policy.

The State did not achieve substantial conformity with Well-being Outcome 2 (Children receive appropriate services to meet their educational needs) or Well-being Outcome 3 (Children receive adequate services to meet their physical and mental health needs). The CFSR case reviews found that the CA was more effective in meeting the educational and mental health needs of children in foster care than in meeting those needs for children in the in-home services cases.

With regard to the systemic factors, the CFSR determined that the State was in substantial conformity with the factors of Statewide Information System; Quality Assurance System; Agency Responsiveness to the Community; and Foster and Adoptive Parent Licensing, Recruitment, and Retention. The State did not achieve substantial conformity with the systemic factors of Case Review System, Training, and Service Array.

The CFSR findings noted a long and positive history of consultation and collaboration between the State and Tribes. However, the CFSR identified a need for a more effective “government-to-government” relationship between the State and the Tribes that would include greater consultation, increased collaboration with regard to Tribal licensing, and improved monitoring of ICWA compliance.

The overall findings with regard to the State’s performance on the safety and permanency outcomes are presented in table 1 at the end of the Executive Summary. Findings regarding well-being outcomes are presented in table 2. Table 3 presents the State’s performance relative to the national standards and table 4 provides information pertaining to the State’s substantial conformity with the seven systemic factors assessed through the CFSR. A summary of major findings is presented below.

## **I. KEY FINDINGS RELATED TO OUTCOMES**

### **Safety Outcome 1: Children are first and foremost protected from abuse and neglect**

Safety Outcome 1 incorporates two indicators. One pertains to the timeliness of initiating a response to a child maltreatment report (item 1), and the other relates to whether children experience a recurrence of substantiated or indicated maltreatment (item 2).

Washington did not achieve substantial conformity with Safety Outcome 1. This determination was based on the following findings:

- The outcome was substantially achieved in 85.7 percent of the cases reviewed, which is less than the 90 percent required for a rating of substantial conformity.
- The State’s rate of maltreatment recurrence (10.8%) did not meet the national standard (6.1% or less) for the percentage of children experiencing more than one substantiated or indicated child maltreatment report within a 6-month period.

The State’s incidence of maltreatment in foster care (0.32%) met the national standard (0.57% or less) for the percentage of children maltreated while in foster care.

A key CFSR finding was that the CA is not consistent in responding to maltreatment reports in accordance with State-established timeframes. Although the CA responded to the majority of reports within State timeframes, delays in responding occurred to some maltreatment reports that were considered to be high risk as well as to some reports classified as low risk.

## **Safety Outcome 2: Children are safely maintained in their homes when possible and appropriate**

Performance on Safety Outcome 2 is assessed through two indicators. One indicator (item 3) addresses the issue of the child welfare agency's efforts to prevent children's removal from their homes by providing services to the families that ensure children's safety while they remain in their homes. The other indicator (item 4) pertains to the child welfare agency's efforts to reduce risk of harm to children.

Washington did not achieve substantial conformity with Safety Outcome 2. This determination was based on the finding that the outcome was substantially achieved in 69.8 percent of the applicable cases reviewed, which does not meet the 90 percent required for a rating of substantial conformity.

The CFSR determined that in 81 percent of the applicable cases reviewed, the CA provided appropriate services to children and families to help children remain safely in their own homes (item 3). A concern identified, however, was that in 30 percent of the applicable cases, safety assessments and/or services were not sufficiently comprehensive to address the risk of harm.

## **Permanency Outcome 1: Children have permanency and stability in their living situations.**

There are six indicators incorporated in the assessment of permanency outcome 1, although not all of them are relevant for all children. The indicators pertain to the child welfare agency's efforts to prevent foster care re-entry (item 5), ensure placement stability for children in foster care (item 6), and establish appropriate permanency goals for children in foster care in a timely manner (item 7). Depending on the child's permanency goal, the remaining indicators focus on the child welfare agency's efforts to achieve permanency goals (such as reunification, guardianship, adoption, and permanent placement with relatives) in a timely manner (items 8 and 9), or their effort to ensure that children who have "other planned living arrangements" as a case goal are in stable placements and adequately prepared for eventual independent living (item 10).

Washington did not achieve substantial conformity with Permanency Outcome 1. This determination was based on the following findings:

- The outcome was substantially achieved in 44.0 percent of the cases, which is less than the 90 percent required for an overall rating of substantial conformity.
- The State Data Profile indicates that FY 2002, the State did not meet the national standards for (1) the rate of children re-entering foster care within 12 months of a prior foster care episode, (2) the percent of children adopted who achieved a finalized adoption

within 24 months of entry into foster care, or (3) the percent of children in foster care for less than 12 months who experienced no more than 2 placements.

State Profile data indicate that the State met the national standard for the percentage of children reunified who were reunified within 12 months of entry into foster care.

Ratings for this outcome varied across CFSR sites. The outcome was determined to be substantially achieved in 67 percent of cases in one site, compared to 50 percent of case in another site and 31 percent of cases in a third site.

A key finding of the CFSR case reviews was that all six indicators for Permanency Outcome 1 were rated as an Area Needing Improvement. Case reviewers determined that the CA was not consistently effective in (1) preventing children's re-entry into foster care, (2) ensuring children's placement stability while in foster care, (3) establishing appropriate permanency goals in a timely manner, and (4) making enough efforts to achieve children's permanency goals in a timely manner. One issue raised by case reviewers pertained to the inappropriate use of the goal of "guardianship" as well as delays in establishing and achieving this goal when it was appropriate. Stakeholders noted that some key barriers to achieving permanency in a timely manner are (1) delays in the process of terminating parental rights; (2) delays in completing the necessary paperwork to finalize an adoption; and (3) a shortage of attorneys and judges that results in frequent continuances and delays in scheduling hearings.

### **Permanency Outcome 2. The continuity of family relationships and connections is preserved for children.**

Permanency Outcome 2 incorporates six indicators that assess the child welfare agency's performance with regard to (1) placing children in foster care in close proximity to their parents and close relatives (item 11); (2) placing siblings together (item 12); (3) ensuring frequent visitation between children and their parents and siblings in foster care (item 13); (4) preserving connections of children in foster care with extended family, community, cultural heritage, religion, and schools (item 14); (5) seeking relatives as potential placement resources (item 15); and (6) promoting the relationship between children and their parents while the children are in foster care (item 16).

Washington did not achieve substantial conformity with Permanency Outcome 2. This determination was based on the finding that the outcome was rated as substantially achieved in 64.0 percent of the cases, which is less than the 90 percent required for substantial conformity.

Performance on this outcome varied across CFSR sites. The outcome was determined to be substantially achieved in 100 percent of cases in one site, compared to 54 percent of cases in another site and 50 percent of cases in a third site.

Key CFSR findings indicate that the CA makes sufficient efforts to place children in close proximity to their families and place siblings together in foster care. However, the CFSR found a lack of consistent effort on the part of the CA to (1) promote frequent visitation between children and their parents and siblings in foster care, (2) seek and assess relatives as placement resources, (3) preserve children's connections to their families and heritage, and (4) support or promote the parent child relationship.

### **Well Being Outcome 1: Families have enhanced capacity to provide for their children's needs.**

Well Being Outcome 1 incorporates four indicators. One pertains to the child welfare agency's efforts to ensure that the service needs of children, parents, and foster parents are assessed and that the necessary services are provided to meet identified needs (item 17). A second indicator examines the child welfare agency's efforts to actively involve parents and children (when appropriate) in the case planning process (item 18). The two remaining indicators examine the frequency and quality of caseworker's contacts with the children in their caseloads (item 19) and with the children's parents (item 20).

Washington did not achieve substantial conformity with Well-Being Outcome 1. This determination was based on the finding that the outcome was rated as substantially achieved in 24.0 percent of the cases reviewed, which is less than the 90 percent required for substantial conformity. The outcome was determined to be substantially achieved in 42.0 percent of cases in one site, 28.0 percent of cases in another site, and 0 percent of cases in a third site.

A key CFSR finding is that each indicator for Well-Being Outcome 1 was rated as an Area Needing Improvement. Case reviews found that the CA was not consistent in its efforts to assess the service needs of children and families and provide necessary services, involve parents and children in the case planning process, and establish face-to-face contact between agency social workers and the children and parents in their caseloads. A particular concern identified in some cases was the lack of effort to incorporate fathers into any aspect of the case process.

### **Well-Being Outcome 2: Children receive appropriate services to meet their educational needs.**

There is only one indicator for Well-Being Outcome 2. It pertains to the child welfare agency's efforts to address the educational needs of children in both foster care and in-home services cases (item 21).

Washington did not achieve substantial conformity with Well-Being Outcome 2. This determination is based on the finding that the outcome was determined to be substantially achieved in 77.4 percent of the applicable cases, which does not meet the 90 percent required for substantial conformity.

A key CFSR finding was that the CA is not consistent in its efforts to meet children's educational needs, particularly the needs of children who receive services while they remain in their own homes. This item was rated a Strength in 95 percent of the foster care cases compared to 50 percent of the in-home services cases. Also, performance on this outcome varied across CFSR sites. The item was rated as a Strength in 88 percent of cases in one site, 67 percent cases in another site, and 62.5 percent of cases in a third site.

**Well-Being Outcome 3: Children receive adequate services to meet their physical and mental health needs.**

This outcome incorporates two indicators that assess the child welfare agency's efforts to meet children's physical health (item 22) and mental health (item 23) needs.

Washington did not achieve substantial conformity with Well-Being Outcome 3. This determination was based on the finding that the outcome was rated as substantially achieved in 59.2 percent of the applicable cases, which is less than the 90 percent required for a determination of substantial conformity.

The CFSR case reviews found that the CA was not consistently effective in meeting children's physical and mental health needs, particularly for children in the in-home services cases. One concern identified was that in some of the in-home services cases, reviewers determined that a mental health assessment and/or mental health services were warranted, but the agency did not respond accordingly. Key concerns identified in some foster care cases pertained to delays in accessing mental health services and/or providing mental health services that did not meet the child's needs. Stakeholders expressed concern that there is a scarcity of mental health services for children throughout the State.

## **II. KEY FINDINGS RELATED TO SYSTEMIC FACTORS**

### **Statewide Information System**

Substantial conformity with the systemic factor of Statewide Information System is determined by whether the State is operating a Statewide information system that can identify the status, demographic characteristics, location, and goals for children in foster care (item 24).

Washington achieved substantial conformity with the systemic factor of Statewide Information System. The CFSR determined that the Statewide information system, known as the Case and Management Information System (CAMIS), can readily identify the status, demographic characteristics, location, and goals for children in foster care and is used extensively to track State performance on CFSR outcome measures.

### **Case Review System**

Five indicators are used to assess the State's performance with regard to the systemic factor of Case Review System. The indicators examine the development of case plans and parent involvement in that process (item 25), the consistency of 6-month case reviews (item 26) and 12-month permanency hearings (item 27), the implementation of procedures to seek termination of parental rights (TPR) in accordance with the timeframes established in the Adoption and Safe Families Act (ASFA) (item 28), and the notification and inclusion of foster and pre-adoptive parents and relative caregivers in case reviews and hearings (item 29).

The State of Washington is not in substantial conformity with the systemic factor of Case Review System. The CFSR found that the State conducts 6-month and 12-month permanency reviews in a timely manner. However, the CFSR also found that foster parents and other caretakers are not informed about these hearings on a consistent basis, or when they are informed, are not routinely given the opportunity to be heard during the proceedings. In addition, the State does not have a process that ensures the consistent involvement of parents and children in the development of case plans. Finally, the CFSR determined that there are delays in completing the process of filing for termination of parental rights (TPR).

### **Quality Assurance System**

Performance with regard to the systemic factor of Quality Assurance System is based on whether the State has developed standards to ensure the safety and health of children in foster care (item 30), and whether the State is operating a statewide quality assurance

system that evaluates the quality and effectiveness of services and measures program strengths and areas needing improvement (item 31).

Washington is in substantial conformity with the systemic factor of Quality Assurance System. The CFSR determined that the State has standards to protect the safety and health of children and that the State has a statewide quality assurance system that focuses on outcomes and uses data and case reviews to improve performance with regard to achieving safety, permanency, and well-being outcomes for children.

### **Training**

The systemic factor of Training incorporates an assessment of the State's new caseworker training program (item 32), ongoing training for child welfare agency staff (item 33), and training for foster and adoptive parents (item 34).

Washington did not achieve substantial conformity with the systemic factor of Training. The CFSR determined that all child welfare agency staff receive initial training that supports the goals and objectives of the agency and are required to complete the training before being assigned case-carrying responsibilities. However, the CFSR also found that although ongoing training opportunities are made available to staff, ongoing training is not mandated. Consequently, there are social workers and supervisors who do not participate in ongoing training. Similarly, although the CFSR found that there is good, mandatory initial training for foster parents, there is no requirement that foster parents participate in ongoing training. The CFSR found that many foster parents are not participating in ongoing training.

### **Service Array**

The assessment of the systemic factor of Service Array addresses three questions: (1) Does the State have in place an array of services to meet the needs of children and families served by the child welfare agency (item 35)? (2) Are these services accessible to families and children throughout the State (item 36)? (3) Can services be individualized to meet the unique needs of the children and family served by the child welfare agency (item 37)?

Washington did not achieve substantial conformity with the systemic factor of Service Array. The CFSR determined that the State has critical gaps in its service array, particularly in the areas of mental health services and substance abuse treatment, and has an insufficient pool of foster homes. In addition, services are not consistently accessible to children and families on a statewide basis. The Statewide Assessment reports that urban communities have a wider array of services than rural communities; rural areas lack

specialized services, have limited choices, and experience chronic shortages. Finally, the CFSR found that services are not consistently individualized to meet cultural, language, and other unique needs of families and children.

### **Agency Responsiveness to the Community**

Performance with regard to the systemic factor of Agency Responsiveness to the Community incorporates an assessment of the State's consultation with external stakeholders in developing the Child and Family Services Plan (items 38 and 39), and the extent to which the State coordinates child welfare services with services or benefits of other Federal or federally-assisted programs serving the same population (item 40).

Washington is in substantial conformity with the systemic factor of Agency Responsiveness to the Community. The CFSR determined that the State engages in ongoing consultation with stakeholders and uses their input in developing the State's 5-year plan. However, the CFSR also found that some stakeholders, including Tribes, are not consulted on a consistent basis in the State's development of the Annual Progress and Services Report. The CFSR determined that the State child welfare agency has implemented, or is part of, various interagency efforts to coordinate and integrate services for children and families that are served by various agencies.

### **Foster and Adoptive Parent Licensing, Recruitment, and Retention**

The assessment of this systemic factor focuses on the State's standards for foster homes and child care institutions (items 41 and 42), the State's compliance with Federal requirements for criminal background checks for foster and adoptive parents (item 43), the State's efforts to recruit foster and adoptive parents that reflect the ethnic and racial diversity of foster children (item 44), and the State's activities with regard to using cross-jurisdictional resources to facilitate permanent placements for waiting children.

Washington is in substantial conformity with the systemic factor pertaining to Foster and Adoptive Parent Licensing, Recruitment and Retention. The CFSR determined that Washington has implemented comprehensive standards for licensing foster family homes and child care institutions and that these standards are consistently applied to all foster homes and child care institutions receiving title IV-E and IV-B funds. In addition, criminal background checks are consistently completed for prospective foster and adoptive parents and the State has a process in place that promotes use of cross-jurisdictional resources for placing children with foster and adoptive parents. However, the CFSR also determined that the State's recruitment and retention efforts are not meeting the need for an adequate and stable pool of foster and adoptive homes that reflect the ethnic and racial diversity of the children in foster care.

**Table 1. Washington CFSR Ratings for Safety and Permanency Outcomes and Items**

<b>Outcomes and Indicators</b>	<b>Outcome Ratings</b>			<b>Item Ratings</b>		
	<i><b>In Substantial Conformity?</b></i>	<i><b>Percent Substantially Achieved*</b></i>	<i><b>Met National Standards?</b></i>	<i><b>Rating**</b></i>	<i><b>Percent Strength</b></i>	<i><b>Met National Standards</b></i>
Safety Outcome 1-Children are first and foremost, protected from abuse and neglect	No	85.7	One met, one not met			
Item 1: Timeliness of investigations				ANI	76	
Item 2: Repeat maltreatment				ANI	97	No
Safety Outcome 2 - Children are safely maintained in their homes when possible and appropriate	No	69.8				
Item 3: Services to prevent removal				ANI	81	
Item 4: Risk of harm				ANI	70	
Permanency Outcome 1- Children have permanency and stability in their living situations	No	44.0	1 met, 3 not met			
Item 5: Foster care re-entry				ANI	71	No
Item 6: Stability of foster care placements				ANI	68	No
Item 7: Permanency goal for child				ANI	72	
Item 8: Reunification, guardianship and placement with relatives				ANI	50	Yes
Item 9: Adoption				ANI	40	No
Item 10: Other planned living arrangement				ANI	50	
Permanency Outcome 2 - The continuity of family relationships and connections is preserved	No	64.0				
Item 11: Proximity of placement				Strength	94	
Item 12: Placement with siblings				Strength	94	
Item 13: Visiting with parents and siblings in foster care				ANI	56	
Item 14: Preserving connections				ANI	76	
Item 15: Relative placement				ANI	72	
Item 16: Relationship of child in care with parents				ANI	58	

\*90 percent of the applicable cases reviewed must be rated as having substantially achieved the outcome for the State to be in substantial conformity with the outcome.

\*\*Items may be rated as a Strength or an Area Needing Improvement (ANI).

**Table 2. Washington CFSR Ratings for Child and Family Well Being Outcomes and Items**

<b>Outcomes and Indicators</b>	<b>Outcome Ratings</b>		<b>Item Ratings</b>			
	<i><b>In Substantial Conformity?</b></i>	<i><b>Percent Substantially Achieved*</b></i>	<i><b>Met National Standards</b></i>	<i><b>Rating**</b></i>	<i><b>Percent Strength</b></i>	<i><b>Met National Standards</b></i>
Well Being Outcome 1 - Families have enhanced capacity to provide for children's needs	No	24.0				
Item 17: Needs/services of child, parents, and foster parents				ANI	46	
Item 18: Child/family involvement in case planning				ANI	48	
Item 19: Worker visits with child				ANI	36	
Item 20: Worker visits with parents				ANI	28	
Well Being Outcome 2 - Children receive services to meet their educational needs	No	77.4				
Item 21: Educational needs of child				ANI	77	
Well Being Outcome 3 - Children receive services to meet their physical and mental health needs are met	No	59.2				
Item 22: Physical health of child				ANI	83	
Item 23: Mental health of child				ANI	64	

\*90 percent of the applicable cases reviewed must be rated as having substantially achieved the outcome for the State to be in substantial conformity with the outcome.

\*\*Items may be rated as a Strength or an Area Needing Improvement (ANI).

**Table 3: Washington Performance on the Six Outcome Measures for Which National Standards have been Established**

<b>Outcome Measure</b>	<b>National Standard</b>	<b>Washington Data FY 2002</b>
Of all children who were victims of a substantiated or indicated maltreatment report in the first 6 months of CY 2001, what percent were victims of another substantiated or indicated report within a 6-month period?	6.1% or less	10.8%
Of all children who were in foster care in the first 9 months of CY 2001, what percent experienced maltreatment from foster parents or facility staff members?	0.57% or less	0.32%
Of all children who entered foster care in FY 2001, what percent were re-entering care within 12 months of a prior foster care episode?	8.6% or less	14.8%
Of all children reunified from foster care in FY 2001, what percent were reunified within 12 months of entry into foster care?	76.2% or more	81.6%
Of all children who were adopted from foster care in FY 2001, what percent were adopted within 24 months of their entry into foster care?	32.0% or more	26.7%
Of all children in foster care during FY 2001 for less than 12 months, what percent experienced no more than 2 placement settings?	86.7% or more	83.7%

**Table 4: Washington CFSR Ratings for the Seven Systemic Factors**

<b>Systemic Factors</b>	<b>In Substantial Conformity?*</b>	<b>Rating**</b>
<b>IV. Statewide Information System</b>	Yes (3)	
Item 24: System can identify the status, demographic characteristics, location and goals of children in foster care		Strength
<b>V. Case Review System</b>	No (2)	
Item 25: Process for developing a case plan and for joint case planning with parents		ANI
Item 26: Process for 6-month case reviews		Strength
Item 27: Process for 12-month permanency hearings		Strength
Item 28: Process for seeking TPR in accordance with ASFA		ANI
Item 29: Process for notifying caregivers of reviews and hearings and for opportunity for them to be heard		ANI
<b>VI. Quality Assurance System</b>	Yes (3)	
Item 30: Standards to ensure quality services and ensure children's safety and health		Strength
Item 31: Identifiable QA system that evaluates the quality of services and improvements		Strength
<b>VII. Training</b>	No (2)	
Item 32: Provision of initial staff training		Strength
Item 33: Provision of ongoing staff training that addresses the necessary skills and knowledge.		ANI
Item 34: Provision of training for caregivers and adoptive parents that addresses the necessary skills and knowledge		ANI
<b>VIII. Service Array</b>	No (2)	
Item 35: Availability of array of critical services		ANI
Item 36: Accessibility of services across all jurisdictions		ANI
Item 37: Ability to individualize services to meet unique needs		ANI
<b>IX. Agency Responsiveness to the Community</b>	Yes (3)	
Item 38: Engages in ongoing consultation with critical stakeholders in developing the CFSP		Strength
Item 39: Develops annual progress reports in consultation with stakeholders		ANI
Item 40: Coordinates services with other Federal programs		Strength
<b>X. Foster and Adoptive Parent Licensing, Recruitment and Retention</b>	Yes (3)	
Item 41: Standards for foster family and child care institutions		Strength
Item 42: Standards are applied equally to all foster family and child care institutions		Strength
Item 43: Conducts necessary criminal background checks		Strength
Item 44: Diligent recruitment of foster and adoptive families that reflect children's racial and ethnic diversity		ANI
Item 45: Uses cross-jurisdictional resources to find placements		Strength

\*Systemic factors rated on a scale from 1 to 4. A rating of 1 or 2 indicates Not in Substantial Conformity.; 3 or 4 indicates Substantial Conformity

\*\*Items may be rated as a Strength or an Area Needing Improvement (ANI).